

Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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PERMIT REQUIREMENTS FOR HYDROSTATIC WATER TESTING OF NEW PIPELINES

The testing of pipelines yields a large amount of wastewater, which may require proper treatment and disposal. It is likely for these discharges that the testing water will need to be stored in the pipeline or in holding tanks to allow for testing of the wastewater in order to determine the pollutant levels and whether treatment of the water is needed prior to its discharge. The permitting mechanism used for the discharge of this wastewater is determined based on the type of discharge:

If the test water is to be discharged to a surface water, then the discharge would be regulated by the U.S. EPA under the Remediation General Permit (RGP), which can be found here: https://www.epa.gov/npdes-permits/remediation-general-permit-rgp-massachusetts-new-hampshire.

If the test water is to be discharged to the ground it would require an Individual Groundwater Discharge Permit, a BRPWP85, which can be found here: https://www.mass.gov/how-to/wp-79-85-individual-discharge-permits.
Groundwater Permits require an application fee and the payment of an annual compliance fee along with monitoring requirements for both the discharge and the area groundwater. Therefore, Groundwater Discharge Permits are not an efficient permitting pathway for discharges of short, rather than continuous, duration.

An exemption from the requirement of a Groundwater Discharge Permit is possible if the applicant applies for and receives MassDEP approval of an Underground Injection Control (UIC) registration and complies with the terms and conditions of the UIC program and the UIC registration. Here is the link to the UIC webpage: http://www.mass.gov/eea/agencies/massdep/water/drinking/underground-injection-control.html
There is a onetime fee for this registration.

If the discharge is going to be to the ground, the Department recommends an Underground Injection Control (UIC) registration, which offers the most efficient process for permitting these discharges.

Under the UIC program this type of discharge would be under the BRP WS06 permit category. When filling out the eDEP UIC registration form, the applicant would select well category = "other"; well type = process water and wastewater disposal.

Since a UIC registration of wastewater discharge from the hydrostatic testing of a pipeline is not common, please contact Joe Cerutti, UIC program coordinator at 617-292-5859 or joseph.cerutti@state.ma.us to determine what information may be required with your UIC registration application. This may help to minimize the timeline for UIC registration approval.